

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROVER PIPELINE LLC,)	
)	No. 2:17-CV-00170-AJS
Plaintiff,)	
)	
v.)	
)	
ROVER TRACT NO. PA-WA-HL-004.500T)	
COMPRISED OF PERMANENT)	
EASEMENT(S) TOTALING 0.9 ACRES,)	
MORE OR LESS, AND TEMPORARY)	
EASEMENT(S) TOTALING 1.33 ACRES,)	
MORE OR LESS, OVER A PARCEL OF)	
LAND IN HANOVER TOWNSHIP,)	
WASHINGTON COUNTY,)	
PENNSYLVANIA, TOTALING 49.571)	
ACRES, MORE OR LESS,)	
)	
JAMES M. BUCHANAN AND DIANE)	
ZACK BUCHANAN FARM #4, LP,)	
)	
ET AL.)	
)	
Defendants.)	

Motion to Enforce

AND NOW, come Thomas T. Frampton, Esquire; Andrea Geraghty, Esquire; and LuAnn Datesh, Esquire, and set forth the following in support of their Motion to Enforce:

1. The above-captioned case is a condemnation action brought by Plaintiff pursuant to the Natural Gas Act; 15 U.S.C. § 717(f)(h) and Federal Rule of Civil Procedure 71.1.
2. By Order filed August 23, 2017, the Honorable Arthur J. Schwab appointed Thomas T. Frampton, Esquire; Andrea Geraghty, Esquire and LuAnn Datesh, Esquire to serve

as Commissioners in accordance with Fed. R. Civil. P. 71.1 and Thomas T. Frampton, Esquire, was appointed Chairman of said Commission.

3. In the Second Interim Status Report of the Commissioners filed on August 1, 2018 (Doc. 101), the Commissioners reported that fees owed to said Commissioners by Defendant Old Wilson Land Trust remained unpaid despite repeated requests and requested the Court to enter an Order directing payment.

4. By Order of August 3, 2018 (Doc. 103) the Court Ordered as follows:

“It is ALSO ORDERED that the following fees and costs owed to the Commissioners, as of June 30, 2018, by Old Wilson Farm Land Trust be paid by September 3, 2018 or suffer further Action of the Court:

Andrea Geraghty, Esquire: \$4,700.00

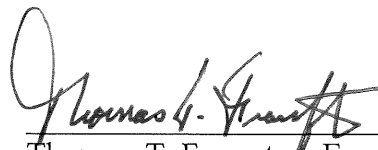
LuAnn Datesh, Esquire: \$4,600.00

Thomas T. Frampton, Esquire: \$5,527.74”

5. All of the above fees remain unpaid and the Commissioners would request that the Court enter an appropriate Order to enforce its Order of August 3, 2018, directing payment of the requested fees to the Commissioners.

Date: October 2, 2018

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas T. Frampton", is written over a horizontal line.

for the Commissioners
Thomas, T. Frampton, Esquire, Chairman
Andrew Geraghty, Esquire
LuAnn Datesh, Esquire